

**UNITED STATES BANKRUPTCY COURT  
DISTRICT OF DELAWARE**

In Re:

GROUPE DYNAMITE INC. *et al.*,

Case No. 20-12085

Debtors in a Foreign Proceeding.

Chapter 15

Hon. John T. Dorsey

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**GOVERNMENT ATTORNEY CERTIFICATION**

Pursuant to the requirement of Local Rule 9010-1(e) for admittance of Government counsel to represent the United States of America (or any officer or agency thereof) or any state or local government (or any officer or agency thereof), the undersigned counsel hereby certifies the following in order to satisfy the requirement to appear to represent the State of Michigan Department of Treasury in this action: I am admitted to practice law in the State of Michigan Courts and the United States District Court for the Eastern District of Michigan. I am in good standing in all jurisdictions to which I have been admitted; and, further, I consent to be bound by the Local Rules of the Bankruptcy Court-District of Delaware and submit to the jurisdiction of this court for disciplinary purposes.

/s/ Heather L. Donald  
Heather L. Donald (MI P-57351)  
Assistant Attorney General  
Attorney for State of Michigan  
Department of Treasury  
3030 W. Grand Blvd.  
Ste 10-200  
Detroit, MI 48302  
(313) 456-0140  
donaldh@michigan.gov